

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:23-cv-20727-RKA

**RYAN BRESLOW, et al.,**

Plaintiffs,

v.

**MARK PHILLIPS, et al.,**Defendants.  
\_\_\_\_\_ /**FIRST AMENDED EXHIBIT LIST**

By stating specific objections to exhibits, the parties do not alleviate their responsibility to introduce and meet admissibility requirements with respect to any exhibit. The parties may abbreviate objections as needed. The number in the “Exhibit Number” column must indicate the pre-marked identification label (*e.g.*, P-1 or D-1).<sup>1</sup>

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-301	MIP-0000: Adopt the Guiding Principles, Terms of Service, and Code of Conduct, dated August 9, 2022	000001-000004			
D-302	MIP-0000: Exhibit A - Certificate of Adoption of the Organization Documents, dated August 23, 2022	000005-000005			

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<sup>1</sup> The Plaintiffs’ exhibits must be marked numerically with the letter “P” as a prefix; the Defendants’ exhibits must be marked numerically with the letter “D” as a prefix.



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-303	MIP-0000: Exhibit B - Guiding Principles, dated August 23, 2022	000006-000024			
D-304	MIP-0000: Exhibit C- Terms of Service, dated August 21, 2022	000025-000043			
D-305	MIP-0000: Exhibit D - Code of Conduct, dated August 21, 2022	000044-000047			
D-306	MIP-0000: Exhibit E - Definitions, dated August 21, 2022	000048-000060			
D-307	MIP-0001: Adopt the Governance and Multisig Processes, dated August 22, 2022	000061-000064			
D-308	MIP-0001: Exhibit A - Governance Process, dated August 22, 2022	000065-000066			
D-309	MIP-0001: Exhibit B - Multi-signature, dated August 22, 2022	000067-000067			
D-310	MIP-0001 voting log, dated August 29, 2022	000068-000068			
D-311	MIP-0002: Initial Treasury Diversification, dated August 22, 2022	000069-000072			
D-312	MIP-0002: Initial Treasury Diversification-proposal, dated August 23, 2022	000073-000076			
D-313	MIP-0002 voting log, dated August 29, 2022	000077-000077			



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D-314	MIP-0003: Bootstrap Product Development, dated August 22, 2022	000078-000081			
D-315	MIP-0003 voting log, dated August 29, 2022	000082-000082			
D-316	MIP-0003: Exhibit A - initialization budget, dated August 29, 2022	000083-000083			
D-317	MIP-0004: Adopt Actions, dated August 22, 2022	000084-000087			
D-318	MIP-0004 voting log, dated August 29, 2022	000088-000088			
D-319	MIP-0004: Exhibit A - DAOLABS, INC., Independent Consulting Agreement, dated August 29, 2022	000089-000099			
D-320	MIP-0004: Exhibit B - DAOLABS Technology License Agreement, dated August 29, 2022	000100-000107			
D-321	MIP-0005: Adopt Banking Relationship Authorizations, dated August 22, 2022	000108-000111			
D-322	MIP-0005 voting log, dated August 29, 2022	000112-000112			



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D-323	MIP-0005: Exhibit A - Movement DAO Resolution to Open a Bank Account, dated August 29, 2022	000113-000114			
D-324	MIP-0006: Appoint a Treasury Committee, dated August 22, 2022	000115-000118			
D-325	MIP-0006 voting log, dated August 29, 2022	000119-000119			
D-326	MIP-0007: Snapshot Consent of the Members of the DAO, dated August 22, 2022	000120-000123			
D-327	MIP-0007 voting log, dated August 29, 2022	000124-000124			
D-328	MIP-0007: Exhibit A - DAOLABS, INC., Indemnification Agreement, dated August 29, 2022	000125-000136			
D-329	MIP-0007: Exhibit B - DAOLABS, INC., Independent Consulting Agreement, dated August 29, 2022	000137-000147			
D-330	MIP-0007: Exhibit C - DAOLABS, LLC, Innovations and Assignment Agreement, dated August 29, 2022	000148-000153			



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D-331	MIP-0007: Exhibit D - DAOLABS Corporation Starter Kit, dated August 29, 2022	000154-000195			
D-332	MIP-0008: Custody ETH in EOA to Prepare for Merge, dated September 12, 2022	000196-000200			
D-333	MIP-0008 voting log, dated September 19, 2022	000201-000201			
D-334	MIP-0009: Approve Launch of DAOLABS Beta Services, dated January 3, 2023	000202-000209			
D-335	MIP-0009 voting log, dated January 9, 2023	000210-000210			
D-336	MIP-0010: Approve Authorized Members to Retain Further Legal Counsel, dated January 3, 2023	000211-000217			
D-337	MIP-0010 voting log, dated January 9, 2023	000218-000218			
D-338	MIP-0011: Pay Deferred Legal Fees From 2022, dated January 3, 2023	000219-000225			
D-339	MIP-0011 voting log, dated January 9, 2023	000226-000226			
D-340	MIP-0012: Pay Deferred Service Provider Fees From 2022, dated January 3, 2023	000227-000233			



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D-341	MIP-0012 voting log, dated January 9, 2023	000234-000234			
D-342	MIP-0013: Notice of Contributors of Questionnaire, dated January 4, 2023	000235-000240			
D-343	MIP-0014: Proposal to Ratify Action to Cycle All Gnosis Keys, dated January 31, 2023	000241-000247			
D-344	MIP-0014 voting log, dated January 9, 2023	000248-000248			
D-345	MIP-0015: Proposal to Ratify the Termination of Certain Members, dated January 31, 2023	000249-000255			
D-346	MIP-0015 voting log, dated February 9, 2023	000256-000256			
D-347	MIP-0016: Proposal to the Update to the DAO's Snapshot Strategy , dated January 31, 2023	000257-000262			
D-348	MIP-0016 voting log, dated February 9, 2023	000263-000263			
D-349	MIP-0017: Proposal for Outstanding Operational Expense Payouts, dated January 31, 2023	000264-000270			
D-350	MIP-0017 voting log, dated February 9, 2023	000271-000271			



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D-351	MIP-0018: Proposal for Deferred 2022 Developer Payouts, dated January 31, 2023	000272-000278			
D-352	MIP-0018 voting log, dated February 9, 2023	000279-000279			
D-353	MIP-0019: Proposal Regarding the Service Provider Fee Payout from 2022, dated January 31, 2023	000280-000286			
D-354	MIP-0019 voting log, dated February 9, 2023	000287-000287			
D-355	MIP-0020: Proposal for Payout of Deferred Legal and Indemnification Expenses, dated January 31, 2023	000288-000295			
D-356	MIP-0020 voting log, dated February 9, 2023	000296-000296			
D-357	MIP-0021: Proposal for the DAO's 2023 Operational Budget, dated January 31, 2023	000297-000305			
D-358	MIP-0021 voting log, dated February 9, 2023	000306-000306	Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901. Without further explanation, context, or accompanying documentation, it is unclear what this document reflects. Rule of completeness. Fed. R. Evid. 106.		



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D-359	MIP-022: Emergency Proposal to Consolidate Crypto Pursuant to Court Order, dated March 6, 2023	000307-000312			
D-360	MIP-0022 voting log, dated March 13, 2023	000313-000313	Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901. Without further explanation, context, or accompanying documentation, it is unclear what this document reflects. Rule of completeness. Fed. R. Evid. 106.		
D-361	MIP-0023: Proposal for Ltd Waiver of Attorney-Client Privilege & Work Product Doctrine w/the Law Firm of Reed Yurchak, dated March 14, 2023	000314-000318			
D-362	MIP-0023 voting log, dated March 21, 2023	000319-000319	Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901. Without further explanation, context, or accompanying documentation, it is unclear what this document reflects. Rule of completeness. Fed. R. Evid. 106.		
D-363	SEC Authorization for Release of Credit Information dated June 27, 2021	000320-000320	Rule of completeness. Fed. R. Evid. 106. This exhibit only includes page 1 of 2.		
D-364	Email dated July 26, 2021, from Joey Krug to Ryan Breslow re: Welcome to Merkaba	000321-000332			
D-365	Consulting Agreement dated July 22, 2021	000333-000342			



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-366	Engineering Outline dated November 11, 2021	000343-000346	Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901. This document does not include a date, authorship information, nor does it identify who sent or received this document. Although it purports to be a contract, it does not con		
D-367	Confidential Independent Contractor Agreement dated December 6, 2021	000347-000352			
D-368	Email dated December 24, 2021, from j.ted-dao@protonmail.com to m@teddao.xyz re: Please find attached engagement letters	000353-000353	Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901. The sender and recipient aliases included in this email are not identified.		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-369	Email dated December 29, 2021, from Marc Welton to Reed Yurchak; Mark Phillips re: Gitbook	000354-000358	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Phillips’s communications with Mr. Yurchak and his law firm in this document occurred in the context of Mr. Phillips acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p>		



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D-370	Email dated January 2, 2022, from Steve Faffle to Reed Yurchak; m@teddao.xyz; me@teddao.xyz re: \$1M Confirmation	000359-000359	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Phillips’s presence on communications with Mr. Yurchak in this document occurred in the context of Mr. Phillips acting as an agent of Plaintiffs and/or Merkaba, Inc.</p>		
D-371	Email dated January 12, 2022, from Reed Yurchak to Ryan Mallory; mmfredyh2@gmail.com re: N/A	000360-000360	Rule of completeness. Fed. R. Evid. 106. This appears to be an incomplete email chain and does not show the subject line, which is necessary to understand its context.		
D-372	Chat with Ryan Breslow and Alexander Fine dated January 24, 2022	000361-000361			



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-373	Chat with Alex Fine and Mark Phillips dated January 27, 2022	000362-000362	Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901. This text exchange does not identify the sender(s) or recipient(s).		
D-374	Discord Chat with Fuego and OBStaker dated February 2, 2022	000363-000363			
D-375	Movement DAO (branch deployed) dated February 2, 2022	000364-000428			
D-376	Discord Chat with FoxFlint; cRekto; AliG; mr_fine; Fuego; ChoosingtheGarden; mrtldgc; AmyMarcella and dated February 15, 2022	000429-000429			
D-377	Email dated March 21, 2022, from Ryan Breslow to Mark Phillips re: The Peace Movement	000430-000430			



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-378	Email dated April 11, 2022, from Marc Welton to Reed Yurchak; Mark Phillips re: <a href="https://gitbook.move.xyz/move/legal/token-sale-and-use">https://gitbook.move.xyz/move/legal/token-sale-and-use</a>	000431-000431	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Phillips’s communications with Mr. Yurchak and his law firm in this document occurred in the context of Mr. Phillips acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p> <p>Rule of completeness. Fed. R. Evid. 106. This exhibit does not include the full email exchange, which is necessary to understand its context.</p>		
D-379	Discord Chat with tankbottoms; OBStacker; myco MOVE; filipviz and dated June 13, 2022	000432-000432	Relevance. Fed. R. Evid. 402. No Plaintiff is included on this document.		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-380	Email dated July 11, 2022, from Benjamin Reed to Reed Yurchak re: Non profit	000433-000433	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rules of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Reed’s communications with Mr. Yurchak and his law firm in this document occurred in the context of Mr. Reed acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p>		



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D-381	Email dated July 14, 2022, from Marc Welton to Mark Phillips re: Template, Draft documents	000434-000446	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Phillips’s communications with Mr. Yurchak’s law firm in this document occurred in the context of Mr. Phillips acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak’s law firm is therefore protected by the attorney-client privilege.</p>		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-382	Email dated July 14, 2022, from Reed Yurchak to Mark Phillips re: Reminder: Invoice 1391 from Action Engine Inc.	000447-000449	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Phillips’s communications with Mr. Yurchak in this document occurred in the context of Mr. Phillips acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p>		
D-383	Letter dated August 2, 2022, from IRS to DAOLABS re: DAOLABS LLC EIN	000450-000451			
D-384	Letter dated August 8, 2022, from IRS to MOVEMENTDAO re: MOVEMENTDAO EIN	000452-000453			



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-385	Letter dated August 10, 2022, from IRS to MOVEMENTDAO INC re: MOVEMENTDAO INC EIN	000454-000456			
D-386	Discord Chat with OBStacker; _anna; Jim OB and Fuego dated August 11, 2022	000457-000457	Rule of completeness. Fed. R. Evid. 106. It appears the full exchange of messages are not included in this exhibit, which is necessary to understand the document's context.		
D-387	Email dated August 17, 2022, from Benjamin Reed to Reed Yurchak re: Change of Registered Agent - DAOLABS, LLC	000458-000458	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Reed’s communications with Mr. Yurchak in this document occurred in the context of Mr. Reed and Mr. Phillips acting as agents of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p>		



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D-388	Text with Alex Fine and Mark Phillips dated August 24, 2022	000459-000459			
D-389	Text with Jon Gordon; Ryan Breslow and Mark Phillips dated August 27, 2022	000460-000460	Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901.		
D-390	Workbook re DAOLABS Budget Accounting dated September 11, 2022	000461-000470			
D-391	Workbook re DAOLABS Headcount and salaries dated September 11, 2022	000471-000471	Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901. The document contains no date, no author, no evidence of recipients, and no other content that explains the nature of the document.		
D-392	Workbook re DAOLABS Stock Allocationtock-Allocation and salaries dated September 11, 2022	000472-000505	Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901. The document contains no date, no author, no evidence of recipients, and no other content that explains the nature of the document.		
D-393	Email dated September 11, 2022, from Mark Phillips to Jon Gordon re: Accounting	000506-000507	Rule of completeness. Fed. R. Evid. 106. The document does not contain the five attachments to the email chain, which are necessary to understand the document's context.		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-394	Email dated September 21, 2022, from Reed Yurchak to Benjamin Reed re: DAOLABS Inc EIN	000508-000510	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6. Mr. Reed’s communications with Mr. Yurchak in this document occurred in the context of Mr. Reed and Mr. Phillips acting as agents of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p>		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-395	Email dated October 1, 2022, from Reed Yurchak to Mark Phillips re: Movement GitBook	000511-000529	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Phillips’s communications with Mr. Yurchak in this document occurred in the context of Mr. Phillips acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p> <p>Rule of completeness. Fed. R. Evid. 106. The attachments to the email are not included.</p>		
D-396	The Movement Endowment dated October 2, 2022	000530-000533			



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-397	Email dated October 17, 2022, from Reed Yurchak to Benjamin Reed re: Review please: DAOLABS Technology License Agreements	000534-000536	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Reed’s communications with Mr. Yurchak in this document occurred in the context of Mr. Reed acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p> <p>Rule of completeness. Fed. R. Evid. 106.</p>		
D-398	Email dated November 14, 2022, from Tomaso Deniro to Benjamin Reed re: New Bolt accounts follow up	000537-000599	<p>Rule of completeness. Fed. R. Evid. 106. The email chains embedded in this document are not complete.</p> <p>Relevance. Fed. R. Evid. 402.</p>		
D-399	Email dated December 8, 2022, from Mark Phillips to Jon Gordon re: A.F. talking points	000600-000602	<p>Rule of completeness. Fed. R. Evid. 106. This document includes some but not all attachments. It omits files that are contained in the attached zip file.</p>		



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-400	Discord Chat dated December 28, 2022	000603-000603	Rule of completeness. Fed. R. Evid. 106. The document contains messages which are out of context and out of chronological order. Failure to properly authenticate. Fed. R. Evid. 901.		
D-401	Email dated January 3, 2023, from Mark Phillips to Ryan Breslow re: Treasury Vote	000604-000604			
D-402	Movement DAO Emergency Committee Meeting Minutes dated January 9, 2023	000605-000651	Failure to properly authenticate. Fed. R. Evid. 901. It is unclear who drafted this document, who it was sent to, who received it, and fails to identify the identities of the individual referenced in the document (e.g., references to speakers by Ethereum addresses only). This document has been altered from its original. Lacks foundation. Fed. R. Evid. 602. Rule of completeness. Fed. R. Evid. 106. The exhibits to the documents are not included.		
D-403	Movement DAO Emergency Committee Meeting Minutes dated January 13, 2023	000652-000702	Failure to properly authenticate. Fed. R. Evid. 901. It is unclear who drafted this document, who it was sent to, who received it, and it fails to identify the identities of the individual referenced in the document (e.g., references to speakers by Ethereum addresses only). This document has been altered from its original. Lacks foundation. Fed. R. Evid. 602. Rule of completeness. Fed. R. Evid. 106. The exhibits to the documents are not included.		



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-404	Response to 0XDBE7...2B57 1/6/23 email, subject 'Some Important Notes' dated January 17, 2023	000703-000706	Failure to properly authenticate. Fed. R. Evid. 901. It is unclear who drafted this document, who it was sent to, who received it, and it fails to identify the identities of the individual referenced in the document (e.g., references to speakers by Ethereum addresses only). Lacks foundation. Fed. R. Evid. 602. Rule of completeness. Fed. R. Evid. 106. The exhibits to the documents are not included.		
D-405	Email dated January 29, 2023, from Ryan Breslow to Reed Yurchak re: Some important notes	000707-000708			
D-406	Movement DAO Emergency Committee Meeting Minutes dated January 26, 2023	000709-000747	Failure to properly authenticate. Fed. R. Evid. 901. It is unclear who drafted this document, who it was sent to, who received it, and it fails to identify the identities of the individual referenced in the document (e.g., references to speakers by Ethereum addresses only). Lacks foundation. Fed. R. Evid. 602. Rule of completeness. Fed. R. Evid. 106. The exhibits to the documents are not included.		
D-407	Movement DAO Authorized Member Meeting Minutes dated January 31, 2023	000748-000756	Failure to properly authenticate. Fed. R. Evid. 901. It is unclear who drafted this document, who it was sent to, who received it, and it fails to identify the identities of the individual referenced in the document (e.g., references to speakers by Ethereum addresses only). Lacks foundation. Fed. R. Evid. 602.		



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-408	Authorized Members Statement re Governance Cycle dated February 3, 2023	000757-000759	Failure to properly authenticate. Fed. R. Evid. 901. It is unclear who drafted this document, who it was sent to, and who received it. Lacks foundation. Fed. R. Evid. 602. Rule of completeness. Fed. R. Evid. 106. The exhibits to the documents are not included.		
D-409	Reed Yurchak Website screenshot dated March 1, 2023	000760-000760	Failure to properly authenticate. Fed. R. Evid. 901. This document does not include a date or URL web address.		
D-410	Letter dated June 7, 2022, from SEC to Mark Phillips re: FOIA Request No. 21-02810	000761-000763			
D-411	DAOLABS LLC business entity information dated March 16, 2023	000764-000764			
D-412	Declaration of Federal Employment dated June 27, 2021, by Mark Phillips	000765-000768			
D-413	SEC, Personnel Security Operations Branch, Fingerprint Privacy Act Advisement dated June 27, 2021	000769-000769			
D-414	Code of Conduct dated August 20, 2022	000770-000773	Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901. It is unclear who drafted this document, who it was sent to, and who received it.		



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-415	MIP-0013: Questionnaire Answers, dated February 25, 2023	000774-000783	Failure to properly authenticate. Fed. R. Evid. 901. This document does not include a date. The document purports to reflect that individuals had reviewed other documents that are not included with the exhibit, but are essential for understanding the context of the document.” Rule of completeness. Fed. R. Evid. 106.		
D-416	MOVE Terms of Service dated January 8, 2023	000784-000786	Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901. It is unclear who drafted this document, who it was sent to, and who received it.		
D-417	Movement DAO presentation - The platform enabling sustainably funded & governed movements	000787-000806	Failure to properly authenticate. Fed. R. Evid. 901. This document does not include a date, authorship information, or any URL web address (to the extent this was available online). Lacks foundation. Fed. R. Evid. 602.		
D-418	Email dated January 10, 2022, from Reed Yurchak to Benjamin Reed re: Custodial Account	000807-000807			
D-419	Email dated January 10, 2022, from Reed Yurchak to Benjamin Reed re: Client Information Sheet (Crypto Custodial Account)	000808-000809			
D-420	Email dated January 11, 2022, from Reed Yurchak to Benjamin Reed re: Engagement Letter, Custodial Crypto Account (fully executed)	000810-000815			



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-421	Discord Chat with thereyanking; myco MOVE; OBStacker; rice\$cracker and mr_fine dated March 24, 2022	000816-000816			
D-422	Ryan Breslow twitter screenshot dated March 24, 2022	000817-000817			
D-423	Discord Chat with Felixander; rice\$cracker; _anna; Fuego and thereyanking dated April 7, 2022	000818-000818	Rule of completeness. Fed. R. Evid. 106. This document does not include the linked document referenced therein.		
D-424	Ryan Breslow twitter screenshot dated April 29, 2022	000819-000819	Rule of completeness. Fed. R. Evid. 106. This document does not include the linked document referenced therein.		
D-425	Discord Chat with and thereyanking dated May 11, 2022	000820-000820	Rule of completeness. Fed. R. Evid. 106. This message thread appears to be cut off and does not include the full exchange. Lacks foundation. Fed. R. Evid. 602. Failure to properly authenticate. Fed. R. Evid. 901. It is unclear to whom this message was sent or on what platform.		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-426	Email dated August 9, 2022, from Benjamin Reed to Reed Yurchak; Mark Phillips re: [None]	000821-000821	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Reed’s communications with Mr. Yurchak in this document occurred in the context of Mr. Reed and Mr. Phillips acting as agents of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p>		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-427	Email dated August 17, 2022, from Benjamin Reed to Reed Yurchak re: Change of Registered Agent	000822-000822	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Reed’s communications with Mr. Yurchak in this document occurred in the context of Mr. Reed and Mr. Phillips acting as agents of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p>		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-428	Email dated September 26, 2022, from Benjamin Reed to Reed Yurchak re: Juicebox Engagement Letter - 1 of 3 (no attachment)	000823-000823	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Reed’s communications with Mr. Yurchak in this document occurred in the context of Mr. Reed and Mr. Phillips acting as agents of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p> <p>Failure to properly authenticate. Fed. R. Evid. 901. The “to” field in the email appears to have been redacted.</p> <p>Rule of completeness. Fed. R. Evid. 106. The attachment to the email is not included.</p>		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-429	Email dated September 26, 2022, from Benjamin Reed to Reed Yurchak re: Opinion Letter - 3 of 3 (no attachment)	000824-000824	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Reed’s communications with Mr. Yurchak in this document occurred in the context of Mr. Reed and Mr. Phillips acting as agents of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p> <p>Rule of completeness. Fed. R. Evid. 106. The attachment to the email is not included.</p>		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-430	Email dated September 27, 2022, from Mark Phillips to Reed Yurchak re: Jango Laboratory Inc Docs - 2 of 3 (no attachment)	000825-000826	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Phillips’s communications with Mr. Yurchak in this document occurred in the context of Mr. Reed and Mr. Phillips acting as agents of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p> <p>Rule of completeness. Fed. R. Evid. 106. The attachment to the email is not included.</p>		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-431	Email dated October 11, 2022, from Reed Yurchak to Benjamin Reed re: Review please: DAOLABS Technology License Agreements	000827-000828	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Reed’s communications with Mr. Yurchak in this document occurred in the context of Mr. Reed acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p>		
D-432	Order form - covered site daolabs.wtf dated November 2, 2022	000829-000830	Relevance. Fed. R. Evid. 402. Any provision of services by Bolt Financial, Inc. to DAO Labs is irrelevant and has no bearing on this case.		
D-433	Order form - covered site move.xyz dated November 2, 2022	000831-000832	Relevance. Fed. R. Evid. 402. Any provision of services by Bolt Financial, Inc. to Movement DAO is irrelevant and has no bearing on this case.		



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-434	Email dated November 14, 2022, from Tomaso Deniro to Benjamin Reed re: New Bolt accounts follow up	000833-000895	Rule of completeness. Fed. R. Evid. 106. The email thread appears to cut off after page 8. Relevance. Fed. R. Evid. 402. Bolt Financial, Inc.'s provision of services to DAO Labs is irrelevant and has no bearing on this case.		
D-435	Discord Chat with Fuego and rice\$cracker dated November 17, 2022	000896-000896			
D-436	DAOLabs Corporation - Investment Overview dated November 20, 2022	000897-000929	Best evidence rule. Fed. R. Evid. 1002. To the extent this exhibit is offered as evidence that the Movement DAO website was operational, the best evidence of that is the website itself.		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-437	Email dated November 29, 2022, from Reed Yurchak to Benjamin Reed re: Address verification requested for DAOLABS Inc	000930-000930	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Reed’s communications with Mr. Yurchak in this document occurred in the context of Mr. Reed acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p>		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-438	Email dated January 30, 2023, from Benjamin Reed to Reed Yurchak re: Official Department of State 2023 Annual Report Filing Notice for N22000008251	000931-000932	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Reed’s communications with Mr. Yurchak in this document occurred in the context of Mr. Reed acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.</p>		
D-439	DAOLabs Corporation - Investment Overview - Jon Gordon Screenshot dated April 9, 2023	000933-000933	<p>Rule of completeness. Fed. R. Evid. 106. This appears to be a single screenshot from a presentation or slideshow. Without further explanation, context, or accompanying documentation, it is unclear what this document reflects. Failure to properly authenticate. Fed. R. Evid. 901. There is nothing to indicate who drafted this document, when it was drafted, or who received it.</p>		



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-440	Chat with Jon Gordon	000934-000938			
D-441	Workbook regarding Full GTM Checklist - Launch Checklist dated December 24, 2021	000939-000941	Failure to properly authenticate. Fed. R. Evid. 901. Without further explanation, context, or accompanying documentation, it is unclear what this document reflects. Lacks foundation. Fed. R. Evid. 602. There is nothing to indicate who drafted this document, when it was drafted, or who sent or received it.		
D-442	Workbook regarding Full GTM Checklist - Launch Features dated December 24, 2021	000942-000943	Failure to properly authenticate. Fed. R. Evid. 901. Without further explanation, context, or accompanying documentation, it is unclear what this document reflects. Lacks foundation. Fed. R. Evid. 602. There is nothing to indicate who drafted this document, when it was drafted, or who sent or received it.		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-443	Email dated December 26, 2021, from Marc Welton to j.ted-dao@protonmail.com re: Gitbook Legal Advice	000944-000946	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney- client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Phillips’s communications with Mr. Yurchak and his law firm in this document occurred in the context of Mr. Phillips acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak and his law firm is therefore protected by the attorney-client privilege.</p>		



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-444	Email dated January 3, 2022, from Reed Yurchak to Marc Welton re: Gitbook headings	000947-000976	<p>Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6.</p> <p>Mr. Phillips’s presence on communications with Mr. Yurchak and his law firm in this document occurred in the context of Mr. Phillips acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak and his law firm is therefore protected by the attorney-client privilege.</p>		
D-445	Email dated May 6, 2022, from Julien Boedec to Ryan Breslow re: Move + Optimism	000977-000981			



Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
D-446	Email dated July 20, 2022, from Reed Yurchak to Mark Phillips re: Structures	000982-000999	Attorney-client privilege. Fed. R. Evid. 501; see also Fla. Stat. § 90.502(2) (“[a] client has a privilege...to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client.”); Fla. Stat. § 90.502(1)(c)(2)(the privilege extends to the agents of the privilege-holder); Gerheiser v. Stephens, 712 So. 2d 1252, 1254-1255 (Fla. Dist. Ct. App. 1998) (“A communication, then, by any form of agency employed or set in motion by the client is within the privilege.”). This document discloses attorney-client confidential material protected under Florida Rule of Professional Conduct 4-1.6 and Washington Rule of Professional Responsibility 1.6. Mr. Phillips’s communications with Mr. Yurchak in this document occurred in the context of Mr. Phillips acting as an agent of Plaintiffs and/or Merkaba, Inc. This communication with Mr. Yurchak is therefore protected by the attorney-client privilege.		
D-447	MIP-0000 voting log, dated August 27, 2022	001000-001000			
D-448	Reed Yurchak Website	001001-001012	Failure to properly authenticate. Fed. R. Evid. 901. This document is undated and does not have an accurate URL web address. The URL web address listed on the document does not take you to a page that contains the information that appears on the exhibit.		



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-449	Peace DAO Movement Juicebox	001013-001013	Failure to properly authenticate. Fed. R. Evid. 901. This document is undated and does not include a URL web address.		
D-450	Declaration of Ryan Breslow dated February 23, 2023	001014-001035			
D-451	Declaration of John Gordon dated March 13, 2023	001036-001038			
D-452	Declaration of Nicolas Bax dated March 13, 2023	001039-001059			
D-453	Declaration of Christopher Berg dated March 13, 2023	001060-001142			
D-454	Declaration of Nicolas Bax dated March 20, 2023	001143-001146			
D-455	Declaration of Christopher Berg dated March 20, 2023	001147-001190			
D-456	Declaration of Reed Yurchak dated March 19, 2023	001191-001195			
D-457	Declaration of Aidan Heintsman dated March 20, 2023	001196-001199			
D-458	Declaration of Nicolas Bax dated March 23, 2023	001200-001210			
D-459	Declaration of Ryan Breslow dated March 23, 2023	001211-001224			



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-460	Declaration of Alex Fine dated March 23, 2023	001225-001243			
D-461	Declaration of John Gordon dated March 23, 2023	001244-001278			
D-462	Declaration of John Gordon dated March 20, 2023	001279-001292			
D-463	SEC Solicitation for Commercial Items dated August 24, 2020	001293-001353			
D-464	W-2 and Wage Statement for 2021 for Mark Phillips from Infotrend Incorporated	001354-001355			
D-465	Discord Chat with Fuego and tankbottoms dated N/A	001356-001360			
D-466	Email dated October 26, 2022, from Ryan Breslow to Jon Gordon; Mark Phillips re: FYI	001361-001361			
D-467	Etherscan - Public Name Tags, Lables & Public Notes	001362-001365	Failure to properly authenticate. Fed. R. Evid. 901. This document is undated and does not include a URL web address.		
D-468	Verified Complaint dated February 23, 2023	001366-001387			
D-469	Discord Direct Messages Private/Fuego Chat	001388-001390	Rule of completeness. Fed. R. Evid. 106. This exhibit appears to be redacted without explanation or context.		



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-470	Discord Chat with Jon Gordon, Benjamin Reed, and Mark Phillips	001391-001393	Rule of completeness. Fed. R. Evid. 106. The exhibit does not include the referenced attachments and is incomplete.		
D-471	Discord Chat with notice to everyone on server	001394-001400			
D-472	Discord Chat with Alex Fine, Benjamin Reed, David Steen, Jon Gordon, and others	001401-001402			
D-473	Movement DAO MOVE Governance Discussion	001403-001405	Rule of completeness. Fed. R. Evid. 106. The exhibit does not include the embedded video link.		
D-474	Movement DAO MOVE Governance Vote	001406-001407	Rule of completeness. Fed. R. Evid. 106. Failure to properly authenticate. Fed. R. Evid. 901. The exhibit does not identify the participants of this message exchange.		
D-475	Twitter messages from Ryan Breslow	001408-001408			
D-476	Movement DAO General Messages from Jon Gordon, Ryan Breslow, and others	001409-001409			
D-477	Movement DAO Peace DAO proposals	001410-001413	Failure to properly authenticate. Fed. R. Evid. 901. This exhibit does not include a URL web address. Rule of completeness. Fed. R. Evid. 106.		
D-478	Chat with Jon Gordon, Mark Phillips, David Steen, and others	001414-001414	Failure to properly authenticate. Fed. R. Evid. 901. This exhibit does not include a URL web address.		



<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range / Other Source</b>	<b>Objections and Reasons</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-479	Movement DAO (branch deployed)	001415-001505	Lacks foundation. Fed. R. Evid. 602. Nothing in the document indicates who made edits to it. Failure to properly authenticate. Fed. R. Evid. 901. Nothing in the document indicates its origin or source. Rule of completeness. Fed. R. Evid. 106. This exhibit does not contain a complete record of edits for all users.		
D-480	Movement DAO - Working Draft (branch main)	001506-001621	Lacks foundation. Fed. R. Evid. 602. No indication of who received or viewed this document. Failure to properly authenticate. Fed. R. Evid. 901. This document is undated, does not include a URL web address, and lacks any other indicia of source or origin.		
D-481	Text Message chain with Jon Gordon	001622			
D-482	New York Times Article "Bolt Built \$11 Billion Payment Business on Inflated Metrics and Eager Investors."	001623-001629			